

ORIGINAL

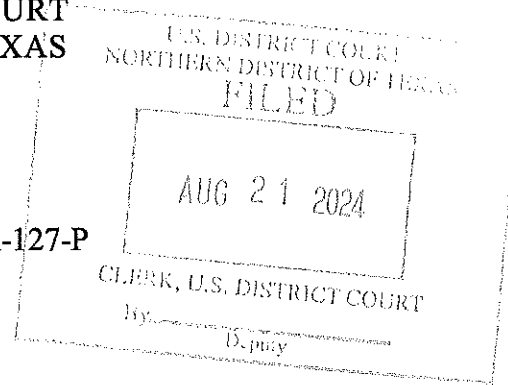
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JULIO ADRIAN SANCHEZ (01)

NO. 4:24-CR-127-P



FACTUAL RESUME

I. Plea:

Count Three: Possession of a Firearm by an Illegal Alien, in violation of 18 U.S.C. § 922(g)(5) and § 924(a)(8).

II. Maximum Penalties:

The maximum penalties the Court can impose include:

- a. imprisonment for a period not to exceed fifteen (15) years;
- b. a fine not to exceed \$250,000;
- c. a term of supervised release not to exceed three (3) years, which may be mandatory under the law and will follow any term of imprisonment. If the defendant violates any condition of supervised release, the Court may revoke such release term and require that the defendant serve an additional period of confinement;
- d. a mandatory special assessment of \$100;
- e. restitution to victims or to the community; and
- f. forfeiture of firearms and ammunition.

III. Elements of the Offense:

In order to establish the offense alleged in Count Three, the government must prove the following elements beyond a reasonable doubt:

- First: That the defendant knowingly possessed a firearm;
- Second: At the time the defendant possessed the firearm, he was an alien illegally and unlawfully in the United States;
- Third: At the time the defendant possessed the firearm, he knew he was an alien illegally and unlawfully in the United States; and
- Fourth: The possession of the firearm affected interstate or foreign commerce; that is: before the defendant possessed the charged

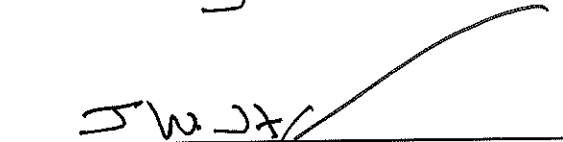
firearm, it had traveled at some time from one state to another or between any part of the United States and any other country.

IV. Stipulated Facts:

Defendant **Julio Adrian Sanchez** was born in Coahuila, Mexico and has no legal status in the United States. On November 30, 2022, in Fort Worth, Texas, Fort Worth Police Department officers conducted a traffic stop of **Sanchez**. No other occupants were in the vehicle. During the stop, **Sanchez** informed officers that he had a firearm in the car. With **Sanchez**'s consent, officers retrieved the firearm, which was a Smith & Wesson, 9mm pistol, bearing serial number JNC3453. At the time he possessed the firearm, **Sanchez** was an alien illegally and unlawfully in the United States, and he knew of his illegal status. An ATF Interstate Nexus Expert determined the firearm listed above was manufactured outside of the state of Texas, which means it had to travel in and affect interstate commerce to be found in Texas.

AGREED AND STIPULATED on this 20th day of August 2024.


JULIO ADRIAN SANCHEZ
Defendant


J. WARREN ST. JOHN
Counsel for Defendant